

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	
	§	
<b>Fieldwood Energy III LLC, et al.,</b>	§	<b>Case No. 20-33948 (MI)</b>
	§	
<b>Post-Effective Date Debtors.</b>	§	<b>Chapter 11</b>
	§	
	§	<b>Jointly Administered</b>

**STIPULATION AND AGREED ORDER WITHDRAWING DUPLICATE PROOFS OF  
CLAIM AND ALLOWING PROOFS OF CLAIM 893 AND 894**

[Relates to Doc. No. 2076]

The United States of America on behalf of the United States Department of Interior (“Interior”), together with the Plan Administrator<sup>1</sup> for the above-captioned reorganized debtors (collectively, the “Debtors”), hereby stipulate and agree as follows:

1. On August 3, 2020 and August 4, 2020, the Debtors each filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Court”).
2. On June 25, 2021, the Bankruptcy Court entered the *Findings of Facts, Conclusions of Law, and Order Confirming Eighth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors* (the “Confirmation Order”) [Docket No. 1751] confirming, as modified therein, the *Eighth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors* (the “Plan”).
3. On August 27, 2021, the effective date of the Plan occurred (the “Effective Date”) and the Debtors filed the *Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of*

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Eighth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors*.

*Fieldwood Energy LLC and its Affiliated Debtors and (II) Occurrence of Effective Date* [Docket No. 2016].

4. On February 1, 2021, via electronic submission, Interior timely filed its Proofs of Claim against GOM Shelf LLC and Fieldwood Energy LLC arising from each Debtor's prepetition obligations to the Office of Natural Resources Revenue (the "ONRR Obligations"). (Claim Nos. 893 and 894).

5. Prior to February 1, 2021, Interior attempted to file Proofs of Claim for the ONRR Obligations via hard copy, however due to delays in delivery, the hard copy Proofs of Claim were not delivered until February 2, 2021. (Claim Nos. 903 and 904).

6. The hard copy Proofs of Claim delivered on February 2, 2021 were identical to the February 1, 2021 electronically submitted Proofs of Claim.

7. On October 6, 2021, the Plan Administrator filed its *First Omnibus Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code and Rule 3007 of the Federal Rules of Bankruptcy Procedure Seeking to Disallow Certain Claims* [Docket No. 2076] (the "Objection"), which set forth objections to Claim Nos. 903 and 904 on the grounds that these claims are duplicates of Claim Nos. 893 and 894.

8. Pursuant to Federal Rule of Bankruptcy Procedure 3006, a creditor may not withdraw a proof of claim as of right after an objection has been filed to such proof of claim. Fed. R. Bankr. P. 3006.

9. To the resolve the Objection, Interior and the Plan Administrator stipulate and agree as follows:

- a. The Objections to Claim Nos. 903 and 904 are withdrawn;
- b. Claim Nos. 903 and 904 are withdrawn;
- c. Claim Nos. 893 and 894 are allowed in the amounts stated therein; and
- d. Nothing contained in this Stipulation modifies or alters the rights and interests of the United States set forth in the Plan and Confirmation Order.

**IT IS SO ORDERED.**

Dated:

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Honorable Marvin Isgur  
United States Bankruptcy Judge

*[signature page follows]*

**AGREED AS TO FORM AND CONTENT:**

Dated: November 5, 2021

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